

SPOKANE COUNTY CLERK INDEXING SHEET

Check one box that best describes this case. This classification in no way affects the legal action of the case

CASE NC

25201095-32

CIVIL

Tort

- ☐ * Medical Malpractice (MED)
☒ * Personal Injury (PIN)
☐ * Property Damage (PRP)
☐ * Wrongful Death (WDE)
☐ * Other Malpractice (MAL)
☐ * Tort Motor Vehicle (TMV)
☐ * Tort - Other (TTO)
☐ Victim of Motor Vehicle Theft (VVT)

Contract/Commercial

- ☐ Collection (COL)
☐ Commercial Non-Contract (COL)
☐ * Commercial/Contract (COM)

Property Rights

- ☐ * Condemnation (CON)
☐ * Foreclosure (FOR)
☐ * Quiet Title (QTI)
☐ * Land Use Petition (LUP)
☐ Unlawful Detainer (UND)
☐ Property Fairness Act (PFA)

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- ☐ Canadian DV Protection Order (CNV)
☐ Civil Harassment (CPO)
☐ Domestic Violence Protection (CPO)
☐ Extreme Risk Protection Order (XRP)
☐ Extreme Risk Protection Order Under 18 (XRU)
☐ Foreign Protection Order (FPO)
☐ Sexual Assault Protection (CPO)
☐ Stalking Protection (CPO)
☐ Vulnerable Adult Protection (CPO)

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- ☐ Abusive Litigation (ABL)
☐ Consumer Protection Act (CPA)
☐ Employment (EMP)
☐ * Injunction (INU)
☐ Malicious Harassment (MHA)
☐ Petition for Civil Comm (Sexual Predator) (PCC)
☐ Seizure of Prop from Commission of a Crime (SPC)
☐ Seizure of Prop from a Crime (SPR)
☐ Property Damage - Gangs (PRG)
☐ Public Records Act (PRA)
☐ School District - Required Action Plan (SDR)
☐ Miscellaneous (MSC)
☐ Emancipation of Minor (EOM)
☐ * Minor Settlement (MST)
☐ * Structured Settlement (MSC)
☐ Relief from Duty to Register (RDR)
☐ Restoration of Firearm Rights (RFR)

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- ☐ Writ of Habeas Corpus (WHC)
☐ Miscellaneous Writs (WMV)

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☐ * Lower Court Appeal - Civil (LCA)
☐ * Lower Court Appeal - Traffic (LCI)
☐ * Dept. of Licensing Revocation (DOL)

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☐ Abstract of Judgment (ABJ)
☐ Transcript of Judgment (TRJ)
☐ Foreign Judgment (FJU)

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- ☐ ** Annulment - Invalidity (INV)
☐ ** Dissolution with Children (DIC)
☐ ** Dissolution - No Children (DIN)
☐ ** Dissolution Dom Partnership with Children (DPC)
☐ ** Dissolution Dom Partnership - No Children (DPN)
☐ ** Invalidity - Domestic Partnership (INP)
☐ ** Legal Separation (SEP)
☐ ** Legal Separation - Domestic Partnership (SPD)
☐ ** Parenting Plan/Child Support (PPS)
☐ * Committed Intimate Relationship w/Children (CIR)
☐ * Committed Intimate Relationship -No Children (CIR)
☐ * DeFacto Parentage (DFP)
☐ Modification (MOD)
☐ Modification: Support Only (MDS)
☐ Out of State Custody (OSC)
☐ Foreign Judgment (FJU)
☐ Mandatory Wage Assignment (MWA)
☐ Miscellaneous (MSC)
☐ *** Relative Visitation (RCV)
☐ Reciprocal, Respondent-In-County (RIC)
☐ Reciprocal, Respondent-Out-of-County (ROC)

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- ☐ Paternity (PAT)
☐ Paternity/URES/UFS (PUR)

Adoption

- ☐ Adoption (ADP)
☐ Confidential Intermediary (MSC)
☐ Relinquishment (REL)
☐ Initial Pre-Placement Report (PPR)

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- ☐ Confidential Name Change (CHN)

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- ☐ Absentee (ABS)
☐ Disclaimer (DSC)
☐ Estate (EST)
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☐ Will Only (WLL)
☐ Miscellaneous (MSC)
☐ Trust (TRS)
☐ Trust/Estate Dispute Resolution (TDR)
☐ Sealed Will Repository (SWR)
☐ Small Estate Affidavit (SEA)
☐ Guardianship (GDN)
☐ Guardianship of the Person (GDN)
☐ * Minor Guardianship Custody (MGC)
☐ Non-Probate Notice to Creditors (NNC)
☐ *Emergency Minor Guardianship (EMG)
☐ *EmergencyMinorGuardianship/Conservatorship(EGC)
☐ Minor Conservatorship (MCE)
☐ Standby Minor Guardianship (SMG)
☐ Limited Guardianship (LGD)
☐ Limited Guardianship of the Person (LGP)
☐ Limited Guardianship of the Estate (LGE)
☐ * Minor Settlement (MST)

ATTENTION:

- CASES MARKED WITH AN * RECEIVE A CASE ASSIGNMENT NOTICE
- CASES MARKED WITH ** RECEIVE A CASE ASSIGNMENT NOTICE AND A COURT'S AUTOMATIC TEMPORARY ORDER
- CASES MARKED WITH *** RECEIVE A CASE ASSIGNMENT NOTICE WITH A JUDGE ONLY

CN: 2520109532

SN: 2

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGIN

**IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY**

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32
NO.

SUMMONS [20 DAYS]

TO: CITY OF SPOKANE

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

1 A lawsuit has been started against you in the above-entitled Court by, Plaintiff.
2 Plaintiff's claim is stated in the written complaint, a copy of which is served upon you
3 with this Summons.

4 In order to defend against this lawsuit, you must respond to the complaint by
5 stating your defense in writing, and serve a copy upon the person signing this summons
6 within twenty (20) days after the service of this Summons, excluding the day of service,
7 or within sixty (60) days if this Summons was served outside the State of Washington, or
8 within forty (40) days if this Summons is served through the Insurance Commissioner's
9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
12 are entitled to notice before a default judgment may be entered.

13 You may demand that the Plaintiff file this lawsuit with the Court. If you do so,
14 the demand must be made in writing and must be served upon the Plaintiffs. Within
15 fourteen (14) days after you serve demand, the Plaintiffs must file this lawsuit with the
16 Court, or the service on you of this Summons and Complaint will be void.

17 If you wish to seek the advice of an attorney in this matter, you should do so
18 promptly so that your written response, if any, may be served on time.

19 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of
20 the State of Washington.

21 DATED at Spokane, Washington this 3RD day of March, 2025.

22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 3

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32
NO. _____

SUMMONS [20 DAYS]

TO: SPOKANE POLICE DEPARTMENT

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

1 A lawsuit has been started against you in the above-entitled Court by, Plaintiff.
2 Plaintiff's claim is stated in the written complaint, a copy of which is served upon you
3 with this Summons.

4 In order to defend against this lawsuit, you must respond to the complaint by
5 stating your defense in writing, and serve a copy upon the person signing this summons
6 within twenty (20) days after the service of this Summons, excluding the day of service,
7 or within sixty (60) days if this Summons was served outside the State of Washington, or
8 within forty (40) days if this Summons is served through the Insurance Commissioner's
9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
12 are entitled to notice before a default judgment may be entered.

13 You may demand that the Plaintiff file this lawsuit with the Court. If you do so,
14 the demand must be made in writing and must be served upon the Plaintiffs. Within
15 fourteen (14) days after you serve demand, the Plaintiffs must file this lawsuit with the
16 Court, or the service on you of this Summons and Complaint will be void.

17 If you wish to seek the advice of an attorney in this matter, you should do so
18 promptly so that your written response, if any, may be served on time.

19 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of
20 the State of Washington.

21 DATED at Spokane, Washington this 3RD day of March, 2025.

22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 4

PC: 2

FILED

MAR 03 2025

**TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK**

ORIGINAL

**IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY**

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32
NO.

SUMMONS [20 DAYS]

TO: CHIEF KEVIN HALL

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

1 A lawsuit has been started against you in the above-entitled Court by, Plaintiff.
2 Plaintiff's claim is stated in the written complaint, a copy of which is served upon you
3 with this Summons.

4 In order to defend against this lawsuit, you must respond to the complaint by
5 stating your defense in writing, and serve a copy upon the person signing this summons
6 within twenty (20) days after the service of this Summons, excluding the day of service,
7 or within sixty (60) days if this Summons was served outside the State of Washington, or
8 within forty (40) days if this Summons is served through the Insurance Commissioner's
9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
12 are entitled to notice before a default judgment may be entered.

13 You may demand that the Plaintiff file this lawsuit with the Court. If you do so,
14 the demand must be made in writing and must be served upon the Plaintiffs. Within
15 fourteen (14) days after you serve demand, the Plaintiffs must file this lawsuit with the
16 Court, or the service on you of this Summons and Complaint will be void.

17 If you wish to seek the advice of an attorney in this matter, you should do so
18 promptly so that your written response, if any, may be served on time.

19 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of
20 the State of Washington.

21 DATED at Spokane, Washington this 3RD day of March, 2025.

22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 5

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY

25201095-32

JENNIFER OLIVER, a single person,

Plaintiff,

NO. _____

SUMMONS [20 DAYS]

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

TO: OFFICER ZACHARY JOHNSON

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

1 A lawsuit has been started against you in the above-entitled Court by, Plaintiff.
2 Plaintiff's claim is stated in the written complaint, a copy of which is served upon you
3 with this Summons.

4 In order to defend against this lawsuit, you must respond to the complaint by
5 stating your defense in writing, and serve a copy upon the person signing this summons
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9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
12 are entitled to notice before a default judgment may be entered.

13 You may demand that the Plaintiff file this lawsuit with the Court. If you do so,
14 the demand must be made in writing and must be served upon the Plaintiffs. Within
15 fourteen (14) days after you serve demand, the Plaintiffs must file this lawsuit with the
16 Court, or the service on you of this Summons and Complaint will be void.

17 If you wish to seek the advice of an attorney in this matter, you should do so
18 promptly so that your written response, if any, may be served on time.

19 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of
20 the State of Washington.

21 DATED at Spokane, Washington this 3RD day of March, 2025.

22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 6

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32

NO. _____

SUMMONS [20 DAYS]

TO: SGT. DARRELL QUARLES

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

1 A lawsuit has been started against you in the above-entitled Court by, Plaintiff.
2 Plaintiff's claim is stated in the written complaint, a copy of which is served upon you
3 with this Summons.

4 In order to defend against this lawsuit, you must respond to the complaint by
5 stating your defense in writing, and serve a copy upon the person signing this summons
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9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
12 are entitled to notice before a default judgment may be entered.

13 You may demand that the Plaintiff file this lawsuit with the Court. If you do so,
14 the demand must be made in writing and must be served upon the Plaintiffs. Within
15 fourteen (14) days after you serve demand, the Plaintiffs must file this lawsuit with the
16 Court, or the service on you of this Summons and Complaint will be void.

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21 DATED at Spokane, Washington this 3RD day of March, 2025.

22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 7

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32

NO. _____

SUMMONS [20 DAYS]

TO: CPL. CHRIS JOHNSON

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

1 A lawsuit has been started against you in the above-entitled Court by, Plaintiff.
2 Plaintiff's claim is stated in the written complaint, a copy of which is served upon you
3 with this Summons.

4 In order to defend against this lawsuit, you must respond to the complaint by
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9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
12 are entitled to notice before a default judgment may be entered.

13 You may demand that the Plaintiff file this lawsuit with the Court. If you do so,
14 the demand must be made in writing and must be served upon the Plaintiffs. Within
15 fourteen (14) days after you serve demand, the Plaintiffs must file this lawsuit with the
16 Court, or the service on you of this Summons and Complaint will be void.

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22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 8

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32
NO. _____

SUMMONS [20 DAYS]

TO: OFFICER DEVON HILL

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

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11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
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14 the demand must be made in writing and must be served upon the Plaintiffs. Within
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21 DATED at Spokane, Washington this 3RD day of March, 2025.

22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 9

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY

25201095-32

JENNIFER OLIVER, a single person,

Plaintiff,

NO. _____

SUMMONS [20 DAYS]

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

TO: OFFICER CHRISTOPHER BENESCHIN

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

1 A lawsuit has been started against you in the above-entitled Court by, Plaintiff.
2 Plaintiff's claim is stated in the written complaint, a copy of which is served upon you
3 with this Summons.

4 In order to defend against this lawsuit, you must respond to the complaint by
5 stating your defense in writing, and serve a copy upon the person signing this summons
6 within twenty (20) days after the service of this Summons, excluding the day of service,
7 or within sixty (60) days if this Summons was served outside the State of Washington, or
8 within forty (40) days if this Summons is served through the Insurance Commissioner's
9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
12 are entitled to notice before a default judgment may be entered.

13 You may demand that the Plaintiff file this lawsuit with the Court. If you do so,
14 the demand must be made in writing and must be served upon the Plaintiffs. Within
15 fourteen (14) days after you serve demand, the Plaintiffs must file this lawsuit with the
16 Court, or the service on you of this Summons and Complaint will be void.

17 If you wish to seek the advice of an attorney in this matter, you should do so
18 promptly so that your written response, if any, may be served on time.

19 This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of
20 the State of Washington.

21 DATED at Spokane, Washington this 3RD day of March, 2025.

22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs
27
28

SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 10

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

OR

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

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DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
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in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32

NO. _____

SUMMONS [20 DAYS]

TO: OFFICER DAVID STONE

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

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9 Office, or a Default Judgment may be entered against you without notice. A Default
10 Judgment is one where Plaintiff is entitled to what the complaint asks for because you
11 have not responded. If you serve a notice of appearance on the undersigned attorney, you
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22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs

27
28 SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 11

PC: 2

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

**IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY**

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
DARRELL QUARLES, in his professional and
individual capacity, CPL. CHRIS JOHNSON,
in his professional and individual capacity,
OFFICER DEVON HILL, in his professional
and individual capacity, OFFICER
CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32
NO.

SUMMONS [20 DAYS]

TO: OFFICER JARED KELLER

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

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22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs
27
28

SUMMONS - 2

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

CN: 2520109532

SN: 12

PC: 2

FILED

MAR 03 2025

**TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK**

ORIGINAL

**IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR THE SPOKANE COUNTY**

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in
his professional and individual capacity,
OFFICER ZACHARY JOHNSON, in his
professional and individual capacity, SGT.
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in his professional and individual capacity,
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DAVID STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and individual
capacity OFFICER JEREMY MCVAY, in his
professional and individual capacity,
Defendants.

25201095-32

SUMMONS [20 DAYS]

TO: OFFICER JEREMY MCVAY

AND TO: Their attorneys.

SUMMONS - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

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22 PHELPS & ASSOCIATES

23
24 /s/ Douglas D. Phelps
25 DOUGLAS D. PHELPS, WSBA 22620
26 Attorney for Plaintiffs
27
28

SUMMONS - 2

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CN: 2520109532

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FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE
POLICE DEPARTMENT, CHIEF
KEVIN HALL, in his professional and
individual capacity, OFFICER
ZACHARY JOHNSON, in his
professional and individual capacity,
SGT. DARRELL QUARLES, in his
professional and individual capacity,
CPL. CHRIS JOHNSON, in his
professional and individual capacity,
OFFICER DEVON HILL, in his
professional and individual capacity,
OFFICER CHRISTOPHER
BENESCHIN, in his professional and
individual capacity, OFFICER DAVID
STONE, in his professional and
individual capacity, OFFICER JARED
KELLER, in his professional and
individual capacity OFFICER JEREMY
MCVAY, in his professional and
individual capacity,

Defendants.

Case No. **25201095-32**

COMPLAINT

Complaint - 1

PHELPS AND ASSOCIATES, PS

Attorneys at Law

2903 N. Stout Rd.

Spokane, WA 99206-4373

(509) 892-0467

Email: phelps@phelpslaw1.com

COMES NOW, the Plaintiff, Jennifer Oliver, a single person, a current resident of the State of Washington, County of Spokane and was at all times a resident of Spokane County, by and through her attorney of record, Douglas D. Phelps, Phelps & Associates, P.S., and hereby alleges the following against the above-named Defendants:

I. JURISDICTION AND PARTIES

1.1 Plaintiff JENNIFER OLIVER, a single person is a current resident of the State of Washington, County of Spokane.

1.2 Defendant CITY OF SPOKANE is a municipal government agency.

1.3 Defendants are law enforcement officers employed by the City of Spokane including POLICE CHIEF KEVIN HALL, OFFICER ZACHARY JOHNSON, SGT. DARRELL QUARLES, CPL. CHRIS JOHNSON, OFFICER DEVON HALL, OFFICER CHRISTOPHER BENESCHIN, OFFICER DAVID STONE, OFFICER JARED KELLER, and OFFICER JEREMY MCVAY are residents of Spokane County, State of Washington, and were employed as law enforcement at all times relevant to this action.

1.4 All acts and omissions alleged herein occurred in Spokane County, State of Washington.

1.5 On June 17th, 2024 the City of Spokane was served with a Notice of Claim pursuant to RCW 4.92.090 setting forth the Plaintiff's claim.

II. VENUE

2.1 At all times hereto, the negligent acts and damages occurred in Spokane County, State of Washington.

2.2 SPOKANE CITY is a municipal government in the State of Washington.

Complaint - 2

1 2.3 The Defendants are law enforcement officers acting in their professional
2 and individual capacities including POLICE CHIEF KEVIN HALL, OFFICER
3 ZACHARY JOHNSON, SGT. DARRELL QUARLES, CPL. CHRIS JOHNSON,
4 OFFICER DEVON HALL, OFFICER CHRISTOPHER BENESCHIN, OFFICER
5 DAVID STONE, OFFICER JARED KELLER, and OFFICER JEREMY MCVAY
6 employed by CITY OF SPOKANE.
7

8 2.4 Therefore, venue is proper in Washington State Superior Court in
9 Spokane County.
10

11 III. CLAIM

12 3.1. On or about March 2, 2023, the Plaintiff's son, Tysean Oliver, a black
13 male, was arrested on a warrant at Ms. Jennifer Oliver's residence located at 1604 W.
14 Central Ave., Spokane, Washington.
15

16 3.2. Spokane City law enforcement officers including Lt. Zachary Johnson,
17 Sgt. DARRELL Quarles, Cpl. Chris Johnson, Officer Devon Hall, Officer Christopher
18 Beneschin, Officer David Stone, Officer Jared Keller and Officer Jeremy McVay
19 surrounded the Plaintiff's residence and proceed to demand Tysean Oliver to surrender
20 and exit the residence.
21

22 3.3. Tysean Oliver exited the residence and promptly was handcuffed and
23 placed into custody.
24

25 3.4. The Plaintiff, Jennnifer Oliver, also exited the residence with a cell phone
26 recording the arrest and her interactions with law enforcement.
27

28 Complaint - 3

1 3.5. The Plaintiff, Jennifer Oliver, then proceeded to discuss her questions
2 about the arrest with Officer David Stone. He was advised that he was being recorded and
3 he advised the Plaintiff that she was being recorded. Ms. Jennifer Oliver was directed to
4 a Sargent Darrell Quarles near the “bear cat” vehicle.

5 3.6. As Ms. Jennifer Oliver approached the “bear cat” vehicle, law
6 enforcement officers began to yell at her to get away from the vehicle. Ms. Jennifer Oliver
7 then walked away from the vehicle still recording with her cellphone.
8

9 3.7. Plaintiff, Ms. Jennifer Oliver then began approaching her residence still
10 holding her camera recording the interaction. Ms. Jennifer Oliver stated she “had babies
11 to care for inside the house.” Ms. Jennifer Oliver then was walking towards her house at
12 1604 W. Central Ave.
13

14 3.8. Plaintiff Jennifer Oliver was recording the interaction on a cell phone as
15 she walked towards her home. Suddenly, she was pursued by shield carrying Cpl. Chris
16 Johnson, Officer Jared Keller and Officer Zachary Johnson who confronted her on the
17 sidewalk to her home. The officers then pushed her onto the ice and snow covered ground
18 using their shields and Ms. Jennifer Oliver struck her head on the sidewalk.
19

20 3.9. Plaintiff Jennifer Oliver was then arrested for obstructing law
21 enforcement and transported to the jail where she was refused by jail staff for medical
22 reasons before being returned home where she was cited and released.
23

24 3.10. Those charges for obstructing were dismissed by the Spokane City
25 Prosecutor on April 2, 2024 after being provided with multiple videos recorded from the
26 door bell camera, cell phone recording from neighbors and cell phone recording from Ms.
27

28 Complaint - 4

1 Jennifer Oliver. (Exhibit A – Motion and Order for Dismissal). These videos provided
2 information contrary to reports from the officers.

3 3.11. The videos document that multiple reports made by Officers Zacary
4 Johnson, Sgt. DARRELL Quarles, Cpl. Chris Johnson, Officer Devon Hill, Officer
5 Christopher Beneschin, Officer David Stone, Officer Jared Keller and Officer Jeremy
6 McVay falsely accused Ms. Jennifer Oliver of obstructing law enforcement and pushing
7 law enforcement.
8

10 IV. NEGLIGENCE

11 Plaintiff re-alleges and incorporates paragraphs 3.1 to 3.11 as paragraph 4.1 to
12 4.11.

13 4.12 That Officers Cpl. Chris Johnson, Officer Jared Keller and Officer
14 Zachary Johnson failed to exercise reasonable care under both their professional and
15 individual capacities by using shields to push the Plaintiff Jennifer Oliver onto an icy
16 surface.

17 4.13 That the acts of Officers Cpl. Chris Johnson, Officer Jared Keller and
18 Officer Zachary Johnson in pushing Ms. Jennifer Oliver caused injury to the Plaintiff.
19

20 4.14 That Officers Cpl. Chris Johnson, Officer Jared Keller and Officer
21 Zachary Johnson owed a duty only to the Plaintiff Ms. Jennifer Oliver to exercise
22 reasonable care under both professional and individual capacities.
23

24 4.15 The the City of Spokane, a municipal government is liable for the
25 actions of their employees pursuant to RCW 4.96.010, RCW 4.96.010 (1) and
26 respondent superior for tortious conduct of their employees.
27

28 Complaint - 5

V. ASSAULT

Plaintiff re-alleges and incorporates Paragraph 4.12 to 4.15 to paragraph 5.12 to 5.15.

5.16 That Officers Cpl. Chris Johnson, Officer Jared Keller and Officer Zachary Johnson placed Plaintiff Jennifer Oliver in reasonable apprehension that she was about to be assaulted by the officers using shields to push her.

5.17 That Officers Cpl. Chris Johnson, Officer Jared Keller and Officer Zachary Johnson and pushed the Plaintiff with shields causing her to fall on the icy ground sustain injuries as a result of the fall and the pushing by the officers with their shields.

5.18 That Plaintiff was retreating to her home to watch “her babies” that were in the residence at 1604 W. Central Ave while video recording the actions of law enforcement when she was violently pushed and shoved.

5.19 That Officers Cpl. Chris Johnson, Officer Jared Keller and Officer Zachary Johnson are liable under both their professional and individual capacities.

5.20 That City of Spokane is liable for the actions of their law enforcement officers Cpl. Chris Johnson, Officer Jared Keller and Officer Zachary Johnson under theory of respondent superior.

VI. EXCESSIVE FORCE

Plaintiff re-alleges and incorporates Paragraph 5.16 to 5.20 to paragraph 6.16 to 6.20.

Complaint - 6

1 6.21 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
2 Officer Zachary Johnson used excessive force in approaching the Plaintiff, Jennifer
3 Oliver who only held a cell phone recording the officers actions.

4 6.22 That the use of three shields approaching the plaintiff who was merely
5 recording their actions and returning to her residence in an unarmed and non-
6 threatening manner was excessive force.

7
8 6.23 Defendants used their shields to push the Plaintiff, Jennifer Oliver
9 backwards onto the slippery and frozen ground causing injury constituting excessive
10 force.

11 6.24 Without any threats from a lone female who was unarmed and recording
12 law enforcement in one hand using a cell phone constituted unreasonable and excessive
13 force.

14
15 6.25 That as a result of the use of excessive force, the Plaintiff Jennifer
16 Oliver, sustained injuries due to the actions of Officers Cpl. Chris Johnson, Officer
17 Jared Keller and Officer Zachary Johnson in their professional and individual
18 capacities.

19
20 6.26 The City of Spokane is liable for the actions of their law enforcement
21 Officers Cpl. Chris Johnson, Officer Jared Keller and Officer Zachary Johnson under
22 theory of respondent superior.

23 **VII. FALSE ARREST**

24
25 Plaintiff re-alleges and incorporates paragraph 6.21 to 6.26 to paragraph 7.21
26 to 7.26.

27
28 Complaint - 7

1 7.27 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
2 Officer Zachary Johnson falsely arrested Plaintiff Jennifer Oliver alleging that she
3 obstructed law enforcement in violation of RCW 9A.76.020.

4 7.28 That Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
5 Officer Zachary Johnson falsely alleged the Plaintiff Jennifer Oliver willfully
6 hindered, delayed or obstructed Officers Cpl. Chris Johnson, Officer Jared Keller and
7 Officer Zachary Johnson in the discharge of their duties arresting Tysean Oliver, who
8 was arrested and detained without incident before the confrontation with the Plaintiff
9 Jennifer Oliver.
10

11 7.29 As the purpose of the contact at 1604 W. Central Ave was completed
12 and accomplished before the contact with Ms. Jennifer Oliver the arrest pursuant to
13 RCW 9A.76.020, obstructing law enforcement was a false arrest because the purpose
14 of arresting Tysen Oliver was complete.
15
16

17 **VIII. UNLAWFUL IMPRISONMENT**

18 Plaintiff re-alleges and incorporates paragraph 7.27 to 7.29 as paragraph 8.27
19 to 8.29.
20

21 8.30 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
22 Officer Zachary Johnson falsely imprisoned Plaintiff Jennifer Oliver by handcuffing
23 her and transporting her to the Spokane County jail for obstructing law
24 enforcement, RCW 9A.76.020.
25
26
27

28 Complaint - 8

1 8.31 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
2 Officer Zachary Johnson acted to punish the Plaintiff by handcuffing her and
3 transporting her to Spokane County Jail where she was refused booking due to
4 medical issues.

5 8.32 The defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
6 Officer Zachary Johnson forced the detention of Plaintiff Jennifer Oliver for
7 unwarranted charges of obstructing law enforcement officers after the officers had
8 arrested the subject of their arrest warrant, Tysean Oliver before their contact with
9 Plaintiff Jennifer Oliver.
10

11 8.33 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
12 Officer Zachary Johnson, Officer Devon Hill and Sgt. DARRELL Quarles failed to
13 exercise reasonable discretion in failing to cite and release the Plaintiff Jennifer
14 Oliver without taking her to jail.
15

16 8.34 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
17 Officer Zachary Johnson, Officer Devon Hill and Sgt. DARRELL Quarles are liable
18 in both their professional and personal capacities.
19

20
21 **IX. VIOLATIONS OF THE FIRST AMENDMENT RIGHTS**

22 Plaintiff re-alleges and incorporates paragraph 8.30 to 8.34 to paragraph 9.30
23 to 9.34.
24

25 9.35 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and
26 Officer Zachary Johnson, Officer Devon Hill, Sgt. DARRELL Quarles and Officer
27

28 Complaint - 9

David Stone violated Plaintiff Jennifer Oliver's First Amendment Rights in ordering her to leave a public area on the street. The officers were acting in their professional and individual capacities.

9.36 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and Officer Zachary Johnson, Officer Devon Hill and Sgt. DARRELL Quarles violated Ms. Jennifer Oliver's rights in arresting her for being in a public street observing and recording police activity. That the officers are liable in their professional and individual capacities.

9.37 Defendants Officers Cpl. Chris Johnson, Officer Jared Keller and Officer Zachary Johnson, Officer Devon Hill and Sgt. DARRELL Quarles in both their professional and individual capacities acted contrary to *Askins v. Dep't of Homeland Security*, 899 F. 3d 1035 (9th Cir. 2018), *Glik v. Cunniffe*, 655 F3d 78 (1st Cir. 2011) in arresting Jennifer Oliver for exercising her First Amendment Rights to observe and document police activity.

X. NEGLIGENT SUPERVISION

Plaintiff re-alleges paragraph 9.35 to 9.37 as paragraph 10.35 to 10.37

10.38 Defendants Chief of Police Kevin Hall, Sgt. Darrell Quarles, and Cpl. Chris Johnson were negligent in their supervision of Officers Devon Hill, David Stone, Jared Keller and Jeremy McVay in failing to intervene or mitigating the actions of the above listed officers in violating the First Amendment Rights of Ms. Jennifer Oliver.

Complaint - 10

10.39 Defendants Chief of Police Kevin Hall, Sgt. Darrell Quarles, and Cpl. Chris Johnson were acting to protect Officers Devon Hill, David Stone, Jared Keller and Jeremy McVay from allegations of false arrest and excessive force against Jennifer Oliver.

10.40 The actions of the supervisors were in violation of their duty to protect Jennifer Oliver from false arrest and the use of excessive force exercised by defendant officers in arresting Jennifer Oliver.

10.41 The action of the supervisors violated Spokane City policies and procedures requiring prompt investigations and reporting of police misconduct by supervising officers.

XI. RELIEF SOUGHT

WHEREFORE, Plaintiff prays for judgment against the defendants, jointly and severally, in an amount that will fairly compensate plaintiff for all damages sustained, costs, and reasonable attorney's fees and costs, interest calculated at the maximum amount allowable by law, and other relief the court deems just, including but not limited to:

- 11.1 Past and future loss of earnings.
- 11.2 Permanent partial impairment of earnings and earning capacity.
- 11.3 Pain and suffering, both mental and physical.
- 11.4 Loss of enjoyment of life.
- 11.5 Past and future special damages.
- 11.6 Interest calculated at the maximum amount allowable by law, including prejudgment interest.
- 11.7 Injunctive relief to require training of officers to prevent injury to other minority community members similarly confronted by police.
- 11.8 Injunctive relief to protect others similarly situated.


Complaint - 11

11.11 Costs and disbursements herein in an amount to be proven at trial.

1.12 Any and all other remedies that the court deems equitable and just.

DATED this 3rd day of March, 2025.

PHELPS AND ASSOCIATES, P.S.
Attorneys for Plaintiff



DOUGLAS D. PHELPS, WSBA #22620
2903 N. Stout Road, Spokane, WA 99206

Complaint - 12

PHELPS AND ASSOCIATES, PS
Attorneys at Law
2903 N. Stout Rd.
Spokane, WA 99206-4373
(509) 892-0467
Email: phelps@phelpslaw1.com

EXHIBIT A

FILED
April 02, 2024
SPOKANE MUNICIPAL COURT

Spokane Municipal Court County of Spokane, State of Washington
CITY OF SPOKANE, Plaintiff, vs OLIVER, JENNIFER ALIA Defendant. 05/15/1976

Case No: 3A0065835

MOTION & ORDER FOR DISMISSAL

☒ WITHOUT PREJUDICE
☐ WITH PREJUDICE

☐ RELEASE DEFENDANT

Police Rpt No. 2023-20040837

I. BASIS

COMES NOW the City of Spokane, by and through the undersigned Assistant Prosecuting Attorney and hereby moves the Court for an order dismissing the above-captioned cause(s) based upon the following grounds:

- | | | |
|---|---|---|
| <input type="checkbox"/> Request of complainant | <input type="checkbox"/> Lack of evidence | <input type="checkbox"/> Lack of witnesses |
| <input type="checkbox"/> Plea negotiation | <input type="checkbox"/> Another charge filed | <input type="checkbox"/> Interests of Justice |
| <input type="checkbox"/> SOC Compliance | <input type="checkbox"/> Prosecutor Motion | <input type="checkbox"/> 5177 MH Diversion Compliance |
| <input type="checkbox"/> DUI or Physical Control pending toxicology report; Speedy Trial | | |
| <input type="checkbox"/> Consolidated Complaint: The above referenced cause number is being dismissed and all charges and any remaining financials are consolidated in cause number . Remove from Defendant's name record or history; filed in error. | | |
| <input checked="" type="checkbox"/> Other: | | |

II. FINDING

After reviewing the record and the basis stated for the motion before the court, the court finds there is good cause to grant the motion of the plaintiff.

III. ORDER

IT IS HEREBY ORDERED that the above-captioned cause(s) be, and hereby is/are, DISMISSED WITHOUT PREJUDICE/WITH PREJUDICE as indicated in the caption above.

IT IS FURTHER ORDERED that all pending court dates as of the date of this Order be, and hereby are, CANCELLED.

IT IS FURTHER ORDERED that all warrants outstanding as of the date of this Order, which are related to any the above-captioned cause numbers, be, and hereby are, RECALLED.

IT IS FURTHER ORDERED that all outstanding No Contact Orders on any or all the above-captioned cause numbers be, and hereby are, RECALLED. (Separate NCO Recall Order Required)

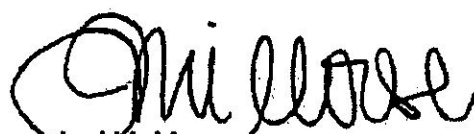
IT IS FURTHER ORDERED that any cash bail not subject to an Authorization to Apply Bail to Case Financial Obligations or surety bond posted as bail in any or all of the above-captioned cause numbers, which have not been previously forfeited by the Court, be and hereby are, EXONERATED.

IT IS FURTHER ORDERED that any outstanding financial obligations are hereby WAIVED.

IT IS FURTHER ORDERED that if the Defendant is in custody on any of the above-captioned case number(s), the Defendant be released from custody on each such case number.

DATE

Presented by:



Joni M. Morse
Assistant City Prosecutor, WSBA#: 45251


JUDGE/COMMISSIONER

2024.04.02 14:13:41

-07'00'

DEFENDANT

COUNSEL FOR DEFENDANT, WSBA #

MOTION & ORDER FOR DISMISSAL -- 1
REV: 2022-08-09

JUSTIN H. BINGHAM
City Prosecutor
909 W. Mallon
Spokane, Washington 99201
(509) 835-5988 Telephone
(509) 835-5927 Facsimile

Patricia Snyder

From: Morse, Joni <jmorse@spokanecity.org>
Sent: Tuesday, April 2, 2024 2:04 PM
To: Diego Arias
Cc: Patricia Snyder
Subject: Oliver 3A0065835

Caution! This message was sent from outside your organization.

[Allow sender](#) | [Block sender](#)

Diego,

I had a chance to review the videos you sent me and the body camera footage. I have decided to dismiss the case without prejudice at this time. That case will be removed from the readiness docket next Thursday.



Joni M. Morse | City of Spokane | Office of the City Attorney | Assistant City Prosecutor
509.835.5993 | 509.835.5927(fax) | jmorse@spokanecity.org | spokanecity.org
909 W. Mallon • Spokane, WA 99201

CONFIDENTIALITY NOTICE:

This e-mail, including any attachments, is confidential and may include privileged information. If you are not the intended recipient, or believe you have received this e-mail in error, please do not copy, print, forward, re-transmit, or otherwise disseminate this e-mail, its contents, or any of its attachments. Please delete this e-mail. Also, please notify the sender that you have received this e-mail in error. Thank you.

ADVISORY: Please be advised the City of Spokane is required to comply with the Public Records Act Chapter 42.56 RCW. This act establishes a strong state mandate in favor of disclosure of public records. As such, the information you submit to the City via email, including personal information, may ultimately be subject to disclosure as a public record.

CN: 2520109532

SN: 14

PC: 1

FILED

MAR 03 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

(Copy Receipt)

Clerk's Date Stamp



SUPERIOR COURT OF WASHINGTON
COUNTY OF SPOKANE

JUDGE RACHELLE E. ANDERSON 91

OLIVER, JENNIFER

CASE NO. 25-2-01095-32

Plaintiff(s)/Petitioner(s),

CASE ASSIGNMENT NOTICE AND
ORDER (NTAS)

vs.

CITY OF SPOKANE ETAL

CASE STATUS CONFERENCE DATE:
JUNE 6, 2025 AT 8:30 AM

Defendant(s)/Respondent(s).

ORDER

YOU ARE HEREBY NOTIFIED that this case is preassigned for all further proceedings to **JUDGE Rachelle E. Anderson.**

You are required to attend a Case Status Conference before your assigned judge on the date also noted above. The Joint Case Status Report must be completed and brought to the Status Conference. A Case Schedule Order, with the trial date, will be issued at the Status Conference.

Under the individual calendar system, the court will operate on a four-day trial week. Trials will commence on Monday, Tuesday, Wednesday or Thursday. Motion Calendars are held on Friday. All motions, other than ex parte motions, must be scheduled with the assigned judge. Counsel must contact the assigned court to schedule motions and working copies of all motion pleadings must be provided to the assigned court at the time of filing with the Clerk of Court. Pursuant to LCR 40 (b) (9), motions must be confirmed no later than 12:00 noon three days before the hearing by notifying the judicial assistant for the assigned judge.

Please contact the assigned court to schedule matters regarding this case. You may contact the assigned court by phone, court department e-mail or through the Spokane County Superior Court web page at <https://www.spokanecounty.org/4625/Superior-Court>

DATED: 03/03/2025

MICHELLE D. SZAMBELAN
PRESIDING JUDGE

NOTICE: The plaintiff shall serve a copy of the Case Assignment Notice on the defendant(s).

CASE NUMBER
2520109532
SN:15.0 PC:1


FILED

3/4/2025

Timothy W Fitzgerald
Spokane County Clerk

(Copy Receipt)

(Clerk's Date Stamp)

 SUPERIOR COURT OF WASHINGTON COUNTY OF SPOKANE
<u>Jennifer Oliver</u> Plaintiff/Petitioner
vs.
<u>City of Spokane et al</u> Defendant/Respondent

CASE NO. 25-2-01095-32NOTICE RE:
DISQUALIFICATION OF JUDGE

Clerks Action Required (ORCJ)

TO THE CLERK AND TO: _____

I. Certificate1.1. I am: Douglas Phelps, attorney for plaintiff in the above entitled action;
(Name and Title)1.2. I believe that a fair and impartial trial in this case cannot be had before: Anderson
(Judge)

1.3. No discretionary rulings as defined in RCW 4.12.050 have been made by the Judge I am disqualifying.

1.4. I have not previously filed a disqualification of judge in this case.

1.5. As required by CR 40 and/or CrR 8.9, there are more than 30 days until the trial date in this matter, or the matter has been reassigned to the Judge against whom I am seeking disqualification within the last 10 days.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

3/4/25

(Date and Place)


[Signature]
Signature (moving)

Pursuant to RCW 4.12.050(1)(a), this Notice must be filed and a copy given to the disqualified Judge on the same day the Notice is filed. Additionally, Court policy requires a conformed copy be delivered to the Court Administrator's Office on the same day the Notice is filed. Upon review, the Court may reject the Notice if the requirements of the statute and Court Rule have not been followed.

CN: 2520109532
SN: 16
PC: 1

FILED
MAR 06 2025
Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

Clerk's Date Stamp

 SUPERIOR COURT OF WASHINGTON COUNTY OF SPOKANE	
OLIVER, JENNIFER Plaintiff(s)/Petitioner(s), vs. CITY OF SPOKANE et al Defendant(s)/Respondent(s).	CASE NO. 25-2-01095-32 ORDER OF PREASSIGNMENT (ORP) ID NUMBER: 94

ORDER

**IT IS HEREBY ORDERED that this case is preassigned for all further proceedings
to: JUDGE TONY HAZEL**

DATED: 03/05/2025



**MICHELLE D. SZAMBELAN
PRESIDING JUDGE**

COPIES MAILED TO:

Douglas Dwight Phelps

SUPERIOR COURT

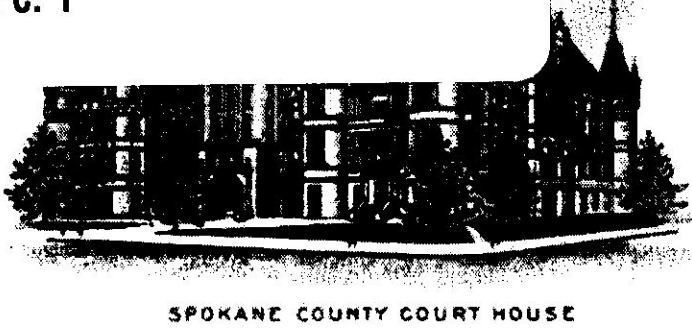
FOR

SPOKANE COUNTY

CN: 2520109532

SN: 17

PC: 1



SPOKANE COUNTY COURT HOUSE

Ashley Callan
Court Administrator
acallan@spokanecounty.org

Leanne M. Wakefield
Assistant Court Administrator
lwakefield@spokanecounty.org

FILED

MAR 06 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

March 5, 2025

DOUGLAS DWIGHT PHELPS
2903 N Stout Rd
Spokane, WA 99206-4373

Re: Spokane County Cause No. 25-2-01095-32
OLIVER, JENNIFER vs CITY OF SPOKANE et al

Dear Counsel:

The above case has been reassigned to Judge Tony Hazel for all further proceedings. Please contact Judicial Assistant Dakota Crowley regarding any scheduling matters.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kim Kilham".

Kim Kilham
Civil Case Coordinator

Copy: Court File

1116 W. Broadway Avenue Spokane,
WA 99260-0350

TEL: (509) 477-5790

FAX: (509) 477-5714

TDD:

RALTR

CN: 2520109532

SN: 18

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served CHIEF KEVIN HALL with the following document(s): **Summons; Complaint.**
3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of CHIEF KEVIN HALL.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025

Service Fee: \$ 58.40


WHISPER FRANTICH

Process Server Registration #1962

County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 19

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served CPL CHRIS JOHNSON with the following document(s): **Summons; Complaint.**
3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of CPL CHRIS JOHNSON.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025


WHISPER FRANETICH

Service Fee: \$ 58.40

Process Server Registration #1962

County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 20

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served SGT DARRELL QUARLES with the following document(s): **Summons; Complaint.**

3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of SGT DARRELL QUARLES.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025


WHISPER FRANETICH

Service Fee: \$ 58.40

Process Server Registration #1962

County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 21

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served OFFICER CHRISTOPHER BENESCHIN with the following document(s):
Summons; Complaint.
3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**


4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of OFFICER CHRISTOPHER BENESCHIN

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025

Service Fee: \$ 58.40


WHISPER FRANETICH
Process Server Registration #1962
County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 22

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served OFFICER JEREMY MCVAY with the following document(s): **Summons;**
Complaint.
3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of OFFICER JEREMY MCVAY.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025


WHISPER FRANETICH

Service Fee: \$ 58.40

Process Server Registration #1962
County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 23

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served OFFICER JARED KELLER with the following document(s): **Summons; Complaint.**

3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of OFFICER JARED KELLER

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025


WHISPER FRANETICH

Service Fee: \$ 58.40

Process Server Registration #1962

County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532
SN: 24
PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served OFFICER DAVID STONE with the following document(s): **Summons; Complaint.**
3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of OFFICER DAVID STONE

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025


WHISPER FRANETICH

Service Fee: \$ 58.40

Process Server Registration #1962
County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 25

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

JENNIFER OLIVER, a single person,
Plaintiff(s),

vs.

CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served SPOKANE POLICE DEPARTMENT with the following document(s):
Summons; Complaint.
3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of SPOKANE POLICE DEPARTMENT.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025


WHISPER FRANETICH

Service Fee: \$ 58.40

Process Server Registration #1962

County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 26

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served THE CITY OF SPOKANE with the following document(s): **Summons; Complaint.**

3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**


4. Service was made:

Authorized Service – by personal delivery to, and accepted by TERRI PFISTER, City Clerk for THE CITY HALL, CITY OF SPOKANE. TERRI PFISTER is authorized to accept service on behalf of THE CITY OF SPOKANE.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025

Service Fee: \$ 58.40


WHISPER FRANETICH
Process Server Registration #1962
County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 27

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served OFFICER DEVON HILL with the following document(s): **Summons; Complaint.**
3. The date, time, and place of service:

Date: **April 15th, 2025** Time: **1:37 PM**

Address: **808 W. Spokane Falls Blvd., Spokane, WA 99201**

4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of OFFICER DEVON HILL

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025

Service Fee: \$ 58.40


WHISPER ERANETICH

Process Server Registration #1962

County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CN: 2520109532

SN: 28

PC: 1

FILED

APR 18 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,
Plaintiff(s),
vs.
CITY OF SPOKANE, et al.,
Defendant(s).

No. 25-2-01095-32

DECLARATION OF SERVICE

I Declare:

1. I am over the age of 18 years, and I am not a party to this action.
2. I served OFFICER ZACHARY JOHNSON with the following document(s): **Summons; Complaint.**
3. The date, time, and place of service:

Date: April 15th, 2025 Time: 1:37 PM

Address: 808 W. Spokane Falls Blvd., Spokane, WA 99201


4. Service was made:

Authorized Service – by personal delivery to, and accepted by SHELLY KOEGLER, Assistant Attorney for THE CITY ATTORNEY. SHELLY KOEGLER is authorized to accept service on behalf of OFFICER ZACHARY JOHNSON

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Spokane, WA on April 25th, 2025

Service Fee: \$ 58.40


WHISPER FRANETICH
Process Server Registration #1962
County of Spokane

DECLARATION OF SERVICE - 1

Gopher, LLC
921 N. Adams St., Ste. C
Spokane, WA 99201
(509) 818-7842

CASE NUMBER
2520109532
SN:29.0 PC:3

FILED

4/23/2025

Timothy W Fitzgerald

Spokane County Clerk

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

JENNIFER OLIVER, a single person,

Plaintiff,

vs.

CITY OF SPOKANE, SPOKANE POLICE
DEPARTMENT, CHIEF KEVIN HALL, in his
professional and individual capacity, OFFICER
ZACHARY JOHNSON, in his professional and
individual capacity, SGT. DARRELL QUARLES,
in his professional and individual capacity, CPL.
CHRIS JOHNSON, in his professional and
individual capacity, OFFICER DEVON HILL, in
his professional and individual capacity,
OFFICER CHRISTOPHER BENESCHIN, in his
professional and individual capacity, OFFICER
DAVID STONE, in his professional and
individual capacity, OFFICER JARED KELLER,
in his professional and individual capacity,
OFFICER JEREMY McVAY, in his professional
and individual capacity,

Defendants.

No. 25-2-01095-32

NOTICE OF APPEARANCE


TO: Plaintiff Jennifer Oliver, and your attorney, Douglas D. Phelps.

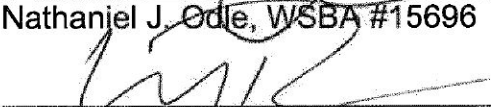
NOTICE OF APPEARANCE - 1

Michael J. Piccolo, City Attorney
OFFICE OF THE CITY ATTORNEY
808 W. Spokane Falls Blvd.
Spokane, WA 99201-3326
(509) 625-6225
FAX (509) 625-6277

1 YOU ARE HEREBY NOTIFIED that the Defendants City of Spokane, Spokane
2 Police Department, Chief Kevin Hall, in his professional and individual capacity,
3 Officer Zachary Johnson, in his professional and individual capacity, Sgt.
4 Darrell Quarles, in his professional and individual capacity, Cpl. Chris Johnson,
5 in his professional and individual capacity, Officer Devon Hill, in his
6 professional and individual capacity, Officer Christopher Beneschin, in his
7 professional and individual capacity, Officer David Stone, in his professional
8 and individual capacity, Officer Jared Keller, in his professional and individual
9 capacity, Officer Jeremy McVay, in his professional and individual capacity,
10 without waiving objection as to improper service, jurisdiction, or any other lawful
11 objection, hereby appear in the above-entitled action by its attorneys, Michael J.
12 Piccolo, City Attorney, and Lynden P. Smithson and Nathaniel J. Odle, Assistant City
13 Attorneys, and you are hereby further notified that all subsequent papers and pleadings
14 in said action, except process, are to be served upon said attorneys at the address
15 stated below.

16 DATED this 23rd day of April, 2025.

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18
19
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22 
Nathaniel J. Odle, WSBA #15696

23
24 
Lynden P. Smithson, WSBA #28865

25 Assistant City Attorneys
26 Attorneys for Defendants

27 NOTICE OF APPEARANCE - 2


28 Michael J. Piccolo, City Attorney
OFFICE OF THE CITY ATTORNEY
808 W. Spokane Falls Blvd.
Spokane, WA 99201-3326
(509) 625-6225
FAX (509) 625-6277

DECLARATION OF SERVICE

I declare, under penalty of perjury, that on the 23rd day of April, 2025, I caused a true and correct copy of the foregoing "Notice of Appearance," to be delivered to the parties below in the manner noted:

Douglas D. Phelps
2903 N. Stout Road
Spokane, WA 99206
Email: phelps@phelpslaw1.com
Attorney for Plaintiff

☒ VIA U.S. MAIL
☐ VIA OVERNIGHT SERVICE
☐ VIA HAND DELIVERY


Doris Stragier
City Attorney's Office
808 W. Spokane Falls Blvd.
Spokane, WA 99201-3326

NOTICE OF APPEARANCE - 3

Michael J. Piccolo, City Attorney
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